

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ISAIAH DORSEY and  
KRYSEAN REYNOLDS,

Defendants.

SUPERSEDING INDICTMENT  
18 U.S.C. § 2251(a) and (e) and § 2  
18 U.S.C. § 2252A(a)(2) and § 2

4:21CR3069

The Grand Jury charges that

COUNT I – Conspiracy to Produce Child Pornography

1. On or about November 22, 2019, in the District of Nebraska and elsewhere, ISAIAH DORSEY and KRYSEAN REYNOLDS, the defendants herein, knowingly and willfully conspired and agreed with each other and other persons known and unknown to the grand jury, to knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of the defendants producing visual depictions of such conduct, and the defendants knew, or had reason to know, that such visual depictions would be transported or transmitted using a means and facility of interstate commerce and foreign commerce and in affecting interstate and foreign commerce, and that such visual depictions were produced using materials that had been shipped, mailed, and transported in and affecting interstate and foreign commerce by any means, including by cellular phone and use of Snapchat, and such visual depictions had actually been transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

Manner and Means of the Conspiracy

2. On or about November 22, 2019, a co-conspirator known to the grand jury lured

Victim 1 from her residence by misrepresenting the purpose for meeting with her. Victim 1 realized after entering a vehicle with this co-conspirator known to the grand jury that ISAIAH DORSEY and KRYSEAN REYNOLDS were also in the vehicle. The defendants took Victim 1 to a residence in Lincoln, Nebraska and forced her to engage in sexual acts with the defendants simultaneously and against her will.

3. While Victim 1 was being forced to engage in sexual acts with the defendants against her will, KRYSEAN REYNOLDS made a video recording of the sexual assault. Following the sexual assault, ISAIAH DORSEY distributed the video through use of the third co-conspirator's phone over Snapchat. ISAIAH DORSEY distributed the video to a group chat used by members of the No Name Demons gang for which all three co-conspirators were members at the time.

4. Following the assault, Victim 1 was dropped off at a gas station, partially clothed, and Victim 1 had to get a ride back to her residence with a stranger.

In violation of Title 18, United States Code, Section 2251(a) and (e) and Section 2.

COUNT II – Distribution of Child Pornography

Between on or about November 22, 2019, and on or about November 19, 2020, in the District of Nebraska, ISAIAH DORSEY and KRYSEAN REYOLDS, defendants herein, did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by cellular phone and Snapchat's electronic communication system; and any material that contains child pornography that has been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and

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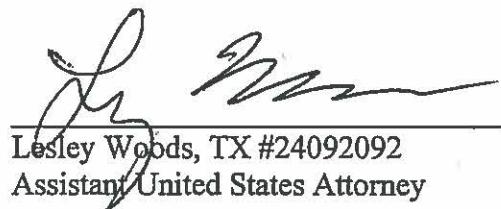
foreign commerce by any means, including by cellular phone and Snapchat's electronic communication system.

In violation of Title 18, United States Code, Section 2252A(a)(2) and Section 2.

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.



Lesley Woods, TX #24092092  
Assistant United States Attorney

